

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

- - -

BRYAN DAVID RANGE,	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
WILLIAM BARR, Attorney	:	
General of the United	:	
States, et al.	:	
	:	
Defendants.	:	NO. 20-cv-03488

- - -

Video conference deposition of BRYAN DAVID
RANGE, taken on Wednesday, December 30, 2020,
commencing at 10:01 a.m., before Andrea M. Brinton,
Certified Court Reporter and Notary Public.

- - -

SUMMIT COURT REPORTING, INC.
Certified Court Reporters and Videographers
1500 Walnut Street, Suite 1610
Philadelphia, Pennsylvania 19102
424 Fleming Pike, Hammonton, New Jersey 08037
(215) 985-2400 * (609) 567-3315 * (800) 477-8648
www.summitreporting.com

BRYAN DAVID RANGE

1 ** ALL PARTIES PRESENT VIA VIDEO CONFERENCE **

2 APPEARANCES:

3 VANGROSSI & RECCHUITI

4 BY: MICHAEL P. GOTTLIEB, ESQUIRE

5 319 Swede Street

6 Norristown, Pennsylvania 19401

7 (610) 279-4200

8 mikem1a1@aol.com

9 and

10 GURA, P.L.L.C.

11 BY: ALAN GURA, ESQUIRE

12 916 Prince Street

13 Suite 107

14 Alexandria, Virginia 22314

15 (703) 835-9085

16 alan@gurapllc.com

17 Counsel for Plaintiff

18 U.S. ATTORNEY'S OFFICE

19 BY: ERIC D. GILL, ESQUIRE

20 BY: PAUL J. KOOB, ESQUIRE

21 615 Chestnut Street

22 Suite 1250

23 Philadelphia, Pennsylvania 19106

24 (215) 861-8200

25 eric.gill@usdoj.gov

 paul.koob@usdoj.gov

 Counsel for Defendants

 ALSO PRESENT:

 Kathleen Jordan - Video Technician

BRYAN DAVID RANGE

1 Q. How did you obtain the deer rifle?

2 A. The deer rifle, I believe, was either a
3 Christmas or a birthday present from my wife, and I'm
4 not sure which holiday it was; it was one of those.

5 Q. Your current wife or your first wife?

6 A. Current wife.

7 Q. Okay. Do you remember when that was, what
8 year?

9 A. I -- I do not.

10 Q. Was it within the past five years?

11 A. No.

12 Q. Was it in the past ten years?

13 A. No.

14 Q. Longer than 20 years ago?

15 A. I -- I'm not sure. I don't -- I don't
16 believe so, but I'm not sure.

17 Q. Okay. And you also mentioned a shotgun
18 that you owned.

19 A. Yes.

20 Q. How did you get that shotgun?

21 A. That was a shotgun that my dad had gotten
22 for me as a -- you know, I was probably -- I don't
23 know, a teenager, young teen, and he had given it to
24 me at some point.

25 Q. Okay. And the deer rifle, what model was

BRYAN DAVID RANGE

1 that, do you remember?

2 A. I do not remember the model.

3 Q. Okay. And the shotgun, do you remember
4 what model that was?

5 A. I don't. I -- it was an old single-shot.
6 That's all I remember about it.

7 Q. Okay. And what happened to this deer rifle
8 and the shotgun?

9 A. In, I believe it was, '06, we had a house
10 fire and it -- everything was destroyed, it took the
11 whole house.

12 Q. Okay. Between 2006 and the present, have
13 you possessed a firearm during that period?

14 A. Yes.

15 Q. Okay. And what was that?

16 A. I had a -- it was a deer rifle. I believe
17 it was a seven-millimeter, I believe. Yeah, I
18 believe it was seven-millimeter, 7mm-08 or something
19 like that.

20 Q. Okay. Do you remember the brand?

21 A. No.

22 Q. Okay. And what happened to that, to that
23 deer rifle?

24 A. I got rid of that, I believe, in 2013. I'm
25 not exactly sure, but I believe it was 2013.

BRYAN DAVID RANGE

1 Q. When you say got rid of it, what do you
2 mean?

3 A. I sold it to Trop Gun Shop.

4 Q. Why did you sell it?

5 A. I came to realize that I was not allowed to
6 possess a firearm.

7 Q. How did you come to that awareness?

8 A. Just --

9 Q. Sorry. Sorry. Withdrawn for a second.

10 How did you -- how did you obtain this
11 rifle, the --

12 A. My wife had gotten it for me Christmas.
13 That was Christmas.

14 Q. Okay. So that was the Christmas present,
15 where you got the deer rifle?

16 A. Yes.

17 Q. Okay.

18 A. I believe she --

19 Q. And --

20 A. I believe, actually, she got it for me
21 before Christmas, but, yes.

22 Q. Okay. But you've owned two deer rifles in
23 your adult life; correct?

24 A. Correct.

25 Q. And do you remember how you got the first

BRYAN DAVID RANGE

1 one?

2 A. Yeah, I said my wife had bought that for
3 me.

4 Q. Okay. So your wife got you -- I'm sorry,
5 your wife bought you both deer rifles as Christmas
6 presents or presents around Christmas; correct?

7 A. Correct.

8 Q. Okay. So you mentioned that you became
9 aware that you weren't legally allowed to own a
10 firearm.

11 How did you come to that awareness?

12 A. Well, I -- assuming it was just doing
13 research on the Internet and just digging and digging
14 until I could find something, and I finally came
15 across this one rule, and I was shocked, but that's
16 how I found out.

17 Q. And you mentioned you were digging and
18 digging.

19 Why -- was there a reason why you were
20 looking to -- you were digging on the Internet?

21 A. Yeah, I -- I mean, I wondered why I had
22 been turned down for PICS, why they had done that,
23 and, you know, they -- go ahead.

24 Q. No, finish. I don't want to interrupt you.

25 A. All right. It's nothing. It's fine.

BRYAN DAVID RANGE

1 Q. So you said you had been turned down for
2 PICS.

3 A. Yes.

4 Q. When were you turned down for PICS?

5 A. I was turned down twice. The first time I
6 remember was in '98 and the second time was, I'm
7 guessing at 2010, '11, somewhere in there.

8 Q. Okay. When you were turned down in 1998,
9 were you trying to buy a firearm? Is that what
10 happened?

11 A. I was, yes.

12 Q. Okay. Do you remember what you were trying
13 to buy?

14 A. No. No, I don't.

15 Q. And at that time, did you do any research
16 then into why you couldn't purchase a firearm?

17 A. I did not.

18 Q. Okay. Why -- at that time, why did you
19 think you were denied the right to --

20 A. Well -- sorry.

21 Q. -- to --

22 A. I was -- sorry. At that time, the guy at
23 the gun store had read off a list of stuff that said
24 if you ever do this, this and this. I mean, it was
25 just crazy stuff, some of the stuff he read.

BRYAN DAVID RANGE

1 And of course I said no, and then he
2 said something like into the -- as to the effect
3 or -- that people get turned down, and I believe
4 he -- he said to me wait a couple days and try again.

5 I was just -- I was, you know, a
6 little bit embarrassed and I just -- I left then.

7 Q. Okay. And did you -- did you try a couple
8 days later or --

9 A. I did not.

10 Q. -- or sometime after that to -- okay.

11 And then you tried again in 2010 or
12 2011; correct?

13 A. Somewhere in there, yes.

14 Q. All right. And what happened on that
15 occasion?

16 A. It was turned down again and, you know,
17 they just -- the guy had asked me -- you know, he
18 read down drug trafficking and child stuff and just,
19 you know, stuff that, of course, I've never done.

20 And I still was at a loss. I just --
21 I thought it had to be a mistake.

22 Q. Okay. So you knew -- you knew that you
23 couldn't -- that PICS would not allow you to purchase
24 a firearm, but at the time you were unaware why you
25 couldn't do it, is that fair to say, around the 2010,

BRYAN DAVID RANGE

1 2011 time frame and earlier?

2 A. Yes. Yes.

3 Q. And then you did some more digging and then
4 you found out -- over the Internet and you found out
5 the reason why you couldn't legally purchase a
6 firearm?

7 A. Yes.

8 Q. And what is -- to your understanding, what
9 is that reason?

10 A. My understanding is because of my welfare
11 fraud conviction, that because of the sentence I
12 could have gotten for it, not what I did get, but
13 what I could have gotten.

14 Q. Okay. And the fraud conviction, that
15 relates to the application for financial assistance
16 from the state for food stamps; correct?

17 A. Yes. I believe it was for food stamps. I
18 just -- it was welfare fraud, so I'm not sure what
19 exactly.

20 Q. Okay. Now, and so -- and you became aware
21 that it was your welfare fraud conviction that
22 prevented you from legally possessing a firearm and
23 you can't -- that was the realization you had in the
24 sort of 2010, 2011 time frame?

25 A. No. I think by the time I had come to

BRYAN DAVID RANGE

1 that, it was -- it was a little bit after that.

2 Q. Meaning a year or two later, longer? What
3 time frame --

4 A. Probably a year --

5 Q. -- are we talking about?

6 A. -- year or two, maybe. Somewhere in that
7 time frame.

8 Q. Did you take any steps to, other than the
9 filing of this lawsuit, you know, to expunge your
10 conviction so that you could own a firearm?

11 A. I believe I did look at an expungement, but
12 if I remember correctly, that can't be done in the
13 state of PA.

14 Q. Did you hire a lawyer for that or was that
15 something on your own?

16 A. That -- my own, you know, Internet search.

17 Q. All right. Did you take any other steps
18 to -- you know, so that you could legally possess a
19 firearm, besides the filing of this lawsuit?

20 A. I did not.

21 Q. So, now, the -- in terms of the firearms
22 that you've owned or possessed -- wait, withdrawn.

23 So your wife, did you discuss that you
24 had been denied the PICS with your wife?

25 A. Yes, I had.

BRYAN DAVID RANGE

1 Q. And she bought you the deer rifles knowing
2 that you couldn't legally own a firearm; correct?

3 A. Well.

4 MR. GURA: Objection, that
5 calls for speculation as to what is his
6 wife knew, and --

7 BY MR. GILL:

8 Q. You can answer.

9 MR. GOTTLIEB: You're allowed
10 to answer, Bryan.

11 THE WITNESS: Oh.

12 My wife did know. We thought
13 for sure that it was a mess-up in the
14 system. I mean, we looked down this list
15 of things and, I mean, I've never
16 drug-trafficked or, you know, any of
17 these things.

18 She's known me since
19 kindergarten, I don't think she was
20 concerned about it.

21 BY MR. GILL:

22 Q. Okay. Okay. And it's your position that
23 once you figured out that you couldn't legally
24 possess it, that's when you, because of your welfare
25 fraud conviction, you then turned around and sold

BRYAN DAVID RANGE

1 Q. Okay. Now, moving forward to 2011, there
2 was an incident involving a fishing license.

3 Do you remember that?

4 A. Yes.

5 Q. And why don't you describe what happened
6 and what led to the -- what led to those criminal
7 offenses?

8 A. I had gone fishing and the fish police -- I
9 believe that's what they called it, is fish police --
10 came and asked me for my license, and I -- I didn't
11 have it on me -- or I thought I didn't have it on me,
12 so they wrote me a ticket and I had so many days to,
13 you know, get ahold of them and show it to them.

14 And when I got home that afternoon or
15 that evening, I went to my old tackle box and started
16 looking, and my wife had informed me that I actually
17 had not gotten my fishing license, that year.

18 Q. Whenever --

19 A. I went -- I'm sorry, go ahead.

20 Q. So you -- you found out that you didn't
21 have a license, and then what did you do?

22 A. I believe I called the fish warden,
23 explained it to him. If I remember, he didn't really
24 seem to care, and then he issued me two fines,
25 fishing without a license and saying I had a license.

BRYAN DAVID RANGE

1 Q. And what was your penalty for that?

2 A. It was an estimate of, like, \$200 fine,
3 maybe.

4 Q. Okay. I mean, my understanding of your
5 charges, one is fishing without a license and then a
6 false ID or statement -- or a false statement.

7 Did you --

8 A. Okay.

9 Q. -- in your -- in your discussion with the
10 state police, did he say that you had made a false
11 statement to him?

12 A. I believe -- I believe he did. I don't
13 know what his words were, but I believe he did --

14 Q. And --

15 A. -- and I told him the circumstances, he
16 didn't seem to care and issued me the summons.

17 Q. And it's your understanding that the false
18 statement that you were penalized for was that you
19 actually -- that you had an ID, when you actually
20 didn't; is that right?

21 A. Correct.

22 Q. Where were you fishing when this -- when
23 you ran -- when you had this incident with the state
24 police?

25 A. It wasn't the state police. The fish

BRYAN DAVID RANGE

1 warden they're called.

2 It would have been Susquehanna River,
3 York County. I believe it's York County.

4 Q. Okay. Have you had any traffic tickets
5 that have led to any criminal charges?

6 A. Criminal, no. No DUIs or anything like
7 that, no.

8 Q. Have you ever been involved in a car
9 accident where someone was injured?

10 A. I don't believe -- I mean, I was in some
11 fender-benders many years ago, but I don't believe
12 there was any injuries ever.

13 Q. Okay. Nothing that would rise to, like,
14 manslaughter or anything like that or --

15 A. No. No.

16 Q. -- the like?

17 Other than the incidents that we've
18 mentioned, have you ever been -- or that we've
19 discussed, have you ever been arrested?

20 A. No.

21 Q. Okay. In the last 15 years, have you ever
22 had a physical fight with someone?

23 A. No.

24 Q. Okay. Any time you've been involved in a
25 physical fight as an adult?